

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

UNITED STATES OF AMERICA

v.

ISRAEL JOSE JUAREZ JR.

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CRIMINAL NO. C-21-797

STIPULATION OF FACT IN SUPPORT OF GUILTY PLEA

The Defendant, ISRAEL JOSE JUAREZ JR., has agreed to stipulate with the United States Attorney for the Southern District of Texas, through the undersigned Assistant United States Attorney, to the following facts. The parties agree that these facts are sufficient to establish a factual basis for the Defendant's plea, pursuant to Fed. R. Crim. P. 11(b)(3). The parties further agree that other facts exist, and those facts may be relevant at sentencing herein.

I.

The Defendant confesses that within the Southern District of Texas on or about August 21, 2021,

- 1) That an alien had entered or remained in the United States in violation of the law;
- 2) That the Defendant knew or recklessly disregarded the fact that the alien was in the United States in violation of the law; and,
- 3) That the Defendant transported the alien within the United States with the intent to further the alien's unlawful presence.

II.

The Defendant further stipulates that had the case proceeded to trial, the United States would have evidence as outlined below, and would have called witnesses to testify that:

On August 21, 2021, ISRAEL JOSE JUAREZ JR. drove a red international tractor truck hauling a white Hyundai trailer into the primary inspection lane of the United States Border Patrol checkpoint located near Sarita, Texas. During the immigration inspection, the canine handler was conducting a non-intrusive free air sniff of the trailer. Due to a canine alert, Juarez Jr. was referred

to a secondary inspection area for a more thorough examination of the trailer. At the secondary lane of inspection, the canine handler conducted a systemic canine search and discovered twenty subjects in the trailer. The agents determined all of subjects were illegally present in the United States. In a post- *Miranda* statement to agents, Juarez Jr. stated that he wanted to make money and agreed to transport illegal aliens. He reported he was going to be paid \$2,000 USD per person and that he was told he would be smuggling ten people to Riviera, Texas. Juarez Jr. stated that he left the truck and trailer at a Valero gas station in San Benito, Texas so the aliens could be loaded.

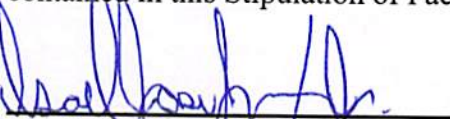
Material Witness Josue Rosado-Toro provided a post-*Miranda* statement to agents. Rosado-Toro, a national of Honduras, reported being unlawfully smuggled into the United States and held at a home for approximately one month. On the day of his apprehension, he was picked up by an unknown male smuggler and taken to the truck and trailer. Rosado-Toro was the last illegal alien to enter the trailer.

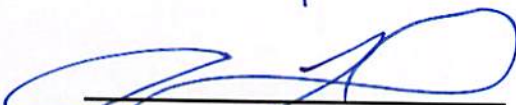
Material Witness Alfonso Velasquez-Carbajal provided a post-*Miranda* statement to agents. Velasquez-Carbajal, a national of Mexico, was another one of the aliens found in the trailer. Velasquez-Carbajal reported being unlawfully smuggled into the United States. Upon entering the United States illegally, he was kept in a trailer for approximately two weeks. On the day of his apprehension, he and other aliens were picked up and taken to the tractor and trailer, where he was told to get into the back of the trailer and not to speak.

III.

The parties hereto agree that the United States could prove the above facts beyond a reasonable doubt.

The undersigned have thoroughly reviewed, understand, and agree that the information contained in this Stipulation of Fact is true and correct.



ISRAEL JOSE JUAREZ JR.
Defendant

Attorney for Defendant

JENNIFER B. LOWERY
ACTING UNITED STATES ATTORNEY

By: J. Parker Gochenour
J. PARKER GOCHENOUR
Assistant United States Attorney